

Dentons US LLP  
1301 K Street, NW  
Suite 600, East Tower  
Washington, DC 20005-3364 USAT +1 202 408 6400  
F +1 202 408 6399

June 30, 2014

**BY HAND DELIVERY****REDACTED - FOR PUBLIC INSPECTION**Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

Re: Southern Communications Services, Inc., d/b/a SouthernLINC Wireless Request for Confidential Treatment - Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On behalf of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless"), enclosed please find a confidential version of SouthernLINC Wireless' completed FCC Form 481, Study Area Code 229006, submitted pursuant to the annual reporting requirements of Sections 54.313 of the Federal Communications Commission's ("Commission") rules. The enclosed confidential version of the Form 481 filing has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION." An additional copy of this filing has been provided, which you are requested to date-stamp and return in the envelope provided. SouthernLINC Wireless is also submitting, via ECFS, a redacted public copy of Form 481. The redacted public copy has been marked "REDACTED - FOR PUBLIC INSPECTION."

In filing Form 481 and its accompanying attachments, SouthernLINC Wireless has provided company-specific information that is not ordinarily disclosed to any person or entity. Accordingly, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> SouthernLINC Wireless requests that the Commission afford confidential treatment to the specifically-indicated information.

The information for which SouthernLINC Wireless requests confidential treatment constitutes sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").<sup>2</sup> Specifically, SouthernLINC Wireless requests confidential treatment of the information within Form 81 that SouthernLINC Wireless is disclosing as such information is not ordinarily disclosed in the industry, and disclosure could have adverse competitive consequences for SouthernLINC Wireless.

Exemption 4 allows parties to withhold from public information "trade secrets and commercial or financial information obtained from any person and privileged or confidential categories of materials not routinely available for public inspection." Applying Exemption 4, the courts have stated that commercial

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> See 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

or financial information is confidential if its disclosure will have either of the following effects: (1) impairment of the government's ability to obtain necessary information in the future; or (2) causation of substantial harm to the competitive position of the person from whom the information was obtained.<sup>3</sup>

Section 0.457(d)(2) of the Commission's rules allows persons submitting materials that they wish to be withheld from public inspection in accordance with Section 552(b)(4) of the FOIA to file a request for non-disclosure. The requirements governing such requests are set forth in Section 0.459(b). In accordance with the specifications delineated in that rule, SouthernLINC Wireless hereby submits the following:

**I IDENTIFICATION OF SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT (SECTION 0.459(B)(1))**

SouthernLINC Wireless seeks confidential treatment of the information within Form 481 marked as confidential, as the information contained therein comprises commercially sensitive information that falls within Exemption 4 of the FOIA.

**II IDENTIFICATION OF THE COMMISSION PROCEEDING IN WHICH THE INFORMATION WAS SUBMITTED OR A DESCRIPTION OF THE CIRCUMSTANCES GIVING RISE TO THE SUBMISSION (SECTION 0.459(B)(2))**

The information was submitted in WC Docket No. 10-90 as an attachment to FCC Form 481 - the Carrier Annual Reporting Data Collection Form.

**III EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED (SECTION 0.459(B)(3))**

The sensitive commercial information within SouthernLINC Wireless' Form 481 would not ordinarily be disclosed by the company. The Form 481 filing contains sensitive commercial information that competitors could use to SouthernLINC Wireless' disadvantage. The Commission has broadly defined commercial information, stating that "[c]ommercial" is broader than information regarding basic commercial operations, such as sales and profits; it includes information about work performed for the purpose of conducting a business's commercial operations."<sup>4</sup>

**IV EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION (SECTION 0.459(B)(4))**

SouthernLINC Wireless provides a variety of wireless communications services, an industry segment in which substantial competition exists. The presence of numerous competitors makes imperative the confidential treatment of sensitive commercial information.

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<sup>3</sup> See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) (footnote omitted); see also *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879-80 (D.C. Cir. 1992), cert. denied, 507 U.S. 984 (1993).

<sup>4</sup> Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, *Memorandum Opinion and Order*, 14 FCC Rcd 1851, 1860 (1998) (citing *Public Citizen Health Research Group v. FDA*, 704 F.2d 1280, 1290 (D.C. Cir. 1983)).

**V EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM (SECTION 0.459(B)(5))**

Release of the information for which SouthernLINC Wireless requests confidentiality could have a significant impact on SouthernLINC Wireless' commercial operations and would provide competitors with an unfair competitive advantage.

**VI IDENTIFICATION OF ANY MEASURES TAKEN TO PREVENT UNAUTHORIZED DISCLOSURE (SECTION 0.459(B)(6))**

SouthernLINC Wireless does not ordinarily disclose the sensitive commercial information disclosed in the Form 481 filing, and SouthernLINC Wireless has treated and continues to treat the information within Form 481 as confidential.

**VII IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES (SECTION 0.459(B)(7))**

The redacted information in the Form 481 filing is not available to the public, and third party access is limited.

**VIII JUSTIFICATION OF PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT THE MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE (SECTION 0.459(B)(8))**

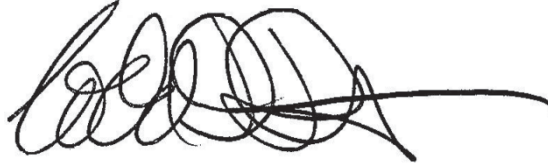
If released, such disclosure could jeopardize SouthernLINC Wireless' business. Among other things, the information within Form 481 provides a detailed analysis of both the quantity and nature of services that SouthernLINC Wireless provides, which competitors of SouthernLINC Wireless could use to gain an unfair competitive advantage. SouthernLINC Wireless respectfully requests that the Commission withhold the information from public inspection indefinitely.

As demonstrated above, the information for which SouthernLINC Wireless seeks confidential treatment is entitled to exemption from disclosure under both FOIA and the Commission's rules. SouthernLINC Wireless would suffer substantial competitive injury if this information were to be disclosed and SouthernLINC Wireless has taken steps to safeguard all of the sensitive commercial information contained in the Form 481 filing from disclosure. Accordingly, SouthernLINC Wireless requests that the information redacted within the Form 481 filing be withheld from public inspection.

In the event that any person or entity requests disclosure of the enclosed confidential information, please notify counsel for SouthernLINC Wireless immediately using the contact information provided above in order to permit it to oppose such request or take such other action to safeguard its interests as it deems necessary.

Please direct any questions as to this matter, including the request for confidential treatment, to the undersigned.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Todd D. Daubert

*Counsel to Southern Communications  
Services, Inc. d/b/a SouthernLINC Wireless*

Enclosures

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Jim Ucci
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jfucci@southernco.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	229006ga510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	229006ga610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/> (yes / no) <input type="radio"/> <input type="radio"/>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

229006ga112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- |       |   |                                     |
|-------|---|-------------------------------------|
| <113> | Maps detailing progress towards meeting plan targets                                      | <input checked="" type="checkbox"/> |
| <114> | Report how much universal service (USF) support was received                              | <input checked="" type="checkbox"/> |
| <115> | How (USF) was used to improve service quality   | <input checked="" type="checkbox"/> |
| <116> | How (USF) was used to improve service coverage  | <input checked="" type="checkbox"/> |
| <117> | How (USF) was used to improve service capacity  | <input checked="" type="checkbox"/> |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year. | <input checked="" type="checkbox"/> |

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July 2013

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

1/1/2014
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	Residential Local Service Charge Effective Date
<701>	Single State-wide Residential Local Service Charge
<702>	

[illegible]



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code				229006
<015>	Study Area Name				SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year				2015
<030>	Contact Name - Person USAC should contact regarding this data			Jim Ucci	
<035>	Contact Telephone Number - Number of person identified in data line <030>			6784431562 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>			jfucci@southernco.com	
<810>	Reporting Carrier			Southern Communications Services, Inc. d/b/a SouthernLINC Wireless	
<811>	Holding Company			Southern Company	
<812>	Operating Company				

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986 /OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	678431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select (Yes, No, NA)

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481	
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
		July 2013	

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

Name of Attached Document

<1220> Link to Public Website

HTTP

<http://www.southerninc.com/service-plans/lifeline/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

## (2000) Price Cap Carrier Additional Documentation

## Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, Frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

## Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1))  
<2011> 3rd Year Certification (47 CFR § 54.313(b)(2))

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## Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Certification  
<2013> 2014 Frozen Support Certification  
<2014> 2015 Frozen Support Certification  
<2015> 2016 and future Frozen Support Certification

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## Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

Certification Support Used to Build Broadband

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## Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification  
<2018> 5th year Broadband Service Certification  
<2019> Interim Progress Certification

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<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

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Name of Attached Document Listing Required Information

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

(3000) Rate Of Return Carrier Additional Documentation  
Data Collection Form

<01>	Study Area Code	229006
<01S>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<02>	Program Year	2015
<03>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<03S>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southnetco.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

	Name of Attached Document Listing Required Information
--	--

(3011) Please check this box to confirm that the attached document(s), on line 3012, contains the required information pursuant to § 54.313(f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

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(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

	Name of Attached Document Listing Required Information
--	--

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report

	(Yes/No)
	(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

	Name of Attached Document Listing Required Information
--	--

(3018) If the response is no on line 3014, Is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

	(Yes/No)
	(Yes/No)

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

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(3023) Underlying information subjected to a review by an independent certified public accountant

--

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

--

(3026) Attach the worksheet listing required information

	Name of Attached Document Listing Required Information
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	229006
<015> Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035> Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: SOUTHERN COMMUNICATIONS SERVICES, INC.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2014
Printed name of Authorized Officer: John Batts	
Title or position of Authorized Officer: Finance Manager	
Telephone number of Authorized Officer: 6784431563 ext.	
Study Area Code of Reporting Carrier: 229006	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	229006
<015> Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035> Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
229006ga112**

**July 1, 2014 § 54.313 Progress Report**

Southern Communications Services, Inc., d/b/a SouthernLINC Wireless (“SouthernLINC,” “Company”) hereby files its progress report on its Five-Year Service Improvement Plan in WC Docket No. 10-90 (“Plan”) describing completed and planned improvements in certain wire centers in the State of Georgia.

This report is comprised of two (2) schedules and five (5) maps which collectively describe SouthernLINC Wireless' progress in improving signal strength, coverage and capacity during the period January 1, 2013, through December 31, 2013. Schedules 1 and 2 provide the amount of high-cost support, by wire center, the Company received during the period January 1, 2013, through December 31, 2013. Schedules 1 and 2 also provide an estimate, by wire center, of the amount of high-cost support the Company expects to receive from the Universal Service Fund during the period January 1, 2014, through June 30, 2016, and the intended use of such support.

This Plan reflects the continuation of the phased reduction in the amount of high-cost support the Company receives from the Universal Service Fund (“USF”) pursuant to the Federal Communications Commission's Connect America Fund Order & FNPRM released November 18, 2011.

**Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
229006ga112**

**July 1, 2014 § 54.313 Progress Report**

**Universal Service Fund Support Received by Wire Center**

The following two (2) schedules show the amount of high-cost support SouthernLINC Wireless received from the Universal Service Fund during calendar year 2013 and the amount it is projected to receive during the period January 1, 2014, through June 30, 2016, for each of the wire centers within the States of Georgia for which SouthernLINC Wireless is designated as a competitive eligible telecommunications carrier ("CETC"). The support amounts for 2013 are derived from the actual high-cost support provided to SouthernLINC Wireless from January 1, through December 31, 2013, based on information obtained from the USAC website. The support amounts for January 1, 2014, through June 30, 2016, reflect the planned phase-out of high-cost support to CETCs pursuant to the Federal Communications Commission's Connect America Fund Order & FNPRM released November 18, 2011.

**Schedule 1**  
**SouthernLINC Wireless**  
**ETC Designated Areas in Which SouthernLINC Wireless**  
**Did Not Receive Universal Service Support**  
**229006ga112**

SouthernLINC Wireless did not received high-cost support from the Universal Service Fund ("USF") in 2013 in the following study areas and currently does not expect to receive high-cost support for these study areas through December 31, 2016.

State:	SAN	CLLI
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**REDACTED IN ITS ENTIRETY**

**Schedule 2**  
**SouthernLINC Wireless**  
**Progress Report on its Five Year Service Improvement Plan**  
**in Designated Service Areas Receiving High-Cost Universal Service Support**  
**229006ga112**

State	SAN	CLLI	High- Cost Support				Total 2014 - 2016	Progress Report Notes
			2013	2014	2015 - 2016			

**REDACTED IN ITS ENTIRETY**

Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
229006ga112

## July 1, 2014 § 54.313 Progress Report

### **New Sites and Material Modifications to Improve Signal Strength, Coverage and Capacity**

The five (5) maps which follow illustrate new sites and material modifications SouthernLINC Wireless made to its network and facilities in Georgia during the period January 1, 2013, through December 31, 2013. These maps show the **REDACTED** new cell sites that were added to the SouthernLINC network and the **REDACTED** other cell sites in Georgia that SouthernLINC Wireless materially modified in the period January 1, 2013, through December 31, 2013, to improve signal strength, coverage, capacity and resiliency. Each of the **REDACTED** sites that were materially modified during the period January 1, 2013, through December 31, 2013, was operational and being used by SouthernLINC Wireless to provide service as of January 1, 2013.

#### **Map 1 – New Cell Sites**

Map 1 illustrates improvements in coverage area made in the State of Georgia during the period January 1, 2013, through December 31, 2013. The green shading illustrates coverage that existed as of January 1, 2013, and the blue shading illustrates additional coverage that is the result of new sites deployed from January 1, 2013, through December 31, 2013. **REDACTED** new sites were deployed in Georgia during this period.

#### **Map 2 – Material Site Modifications in Georgia – Antennas Added/Adjusted**

Shaded in light blue on Map 2 are the **REDACTED** cell sites in Georgia where capital investments were made to raise in height and/or upgraded antennas to improve signal strength and coverage during the period January 1, 2013, through December 31, 2013.

#### **Map 3 – Material Site Modifications in Georgia – Base Radio Additions**

Shaded in yellow on Map 3 are the **REDACTED** cell sites in Georgia where additional base radios were installed during the period January 1, 2013 through December 31, 2013.

Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
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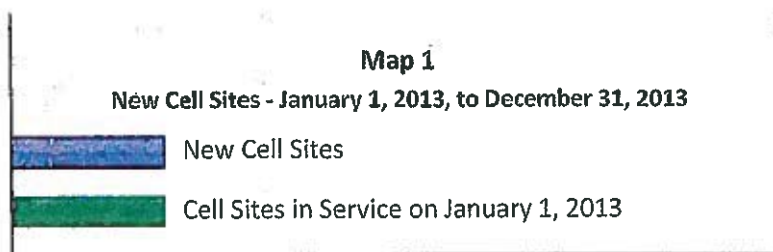
**July 1, 2014 § 54.313 Progress Report**

**Map 4 – Material Site Modifications in Georgia – On-Site Generators Added**

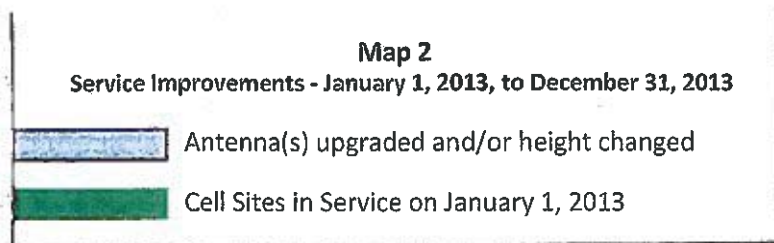
Shaded in orange on Map 4 is the **REDACTED** cell site where a back-up power generator was installed, during the period January 1, 2013, through December 31, 2013, supplementing existing battery back-up power capability.

**Map 5 – Material Site Modifications in Georgia – Equipment Buildings Replaced**

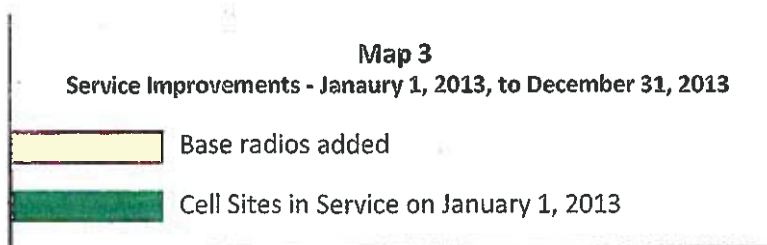
On Map 5 shaded in pink, are the **REDACTED** cell sites where equipment buildings were replaced during the period January 1, 2013, through December 31, 2013. Among other things, the equipment buildings house base radios, back-up power batteries and back-up power generators.



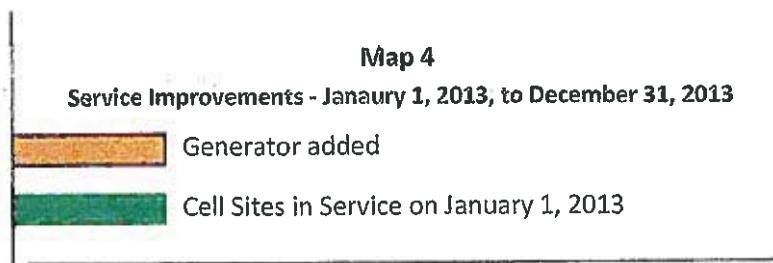
**REDACTED IN ITS ENTIRETY**



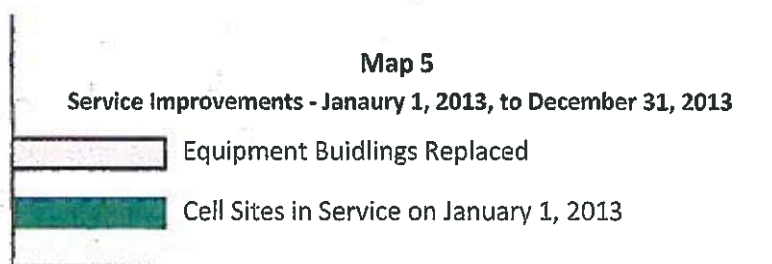
**REDACTED IN ITS ENTIRETY**



**REDACTED IN ITS ENTIRETY**



**REDACTED IN ITS ENTIRETY**



**REDACTED IN ITS ENTIRETY**

Southern Communications Services, Inc.  
d/b/a SouthernLINC Wireless  
229006ga510

**Southern Communications Services, Inc., d/b/a SouthernLINC Wireless  
Certification Required by 47 C.F.R. §54.313(a)(5) - WC Docket No. 10-90**

This certification is submitted on behalf of Southern Communications Services, Inc., d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") in accordance with 47 C.F.R. § 54.313(a)(5).

On behalf of SouthernLINC Wireless I, Donald R. Horsley, hereby certify that SouthernLINC Wireless complies with CTIA Consumer Code for Wireless Service and therefore in compliance with applicable service quality standards and consumer protection rules pursuant to 47 C.F.R. § 54.202(a)(3).

I certify under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2014.



Donald R. Horsley  
President & CEO, Southern Communications Services, Inc.  
d/b/a SouthernLINC Wireless

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 20 day of June, 2014.



NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_ My Commission Expires 4/26/16

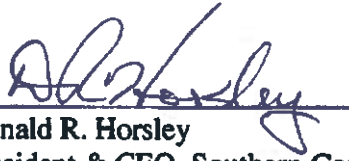
Southern Communications Services, Inc.  
d/b/a SouthernLINC Wireless  
229006ga610

**Southern Communications Services, Inc., d/b/a SouthernLINC Wireless  
Certification Required by 47 C.F.R. §54.313(a)(6) - WC Docket No. 10-90**

This certification is submitted on behalf of Southern Communications Services, Inc., d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") in accordance with 47 C.F.R. § 54.313(a)(6).

On behalf of SouthernLINC Wireless I, Donald R. Horsley, hereby certify that SouthernLINC Wireless is capable of functioning in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2) as described in the accompanying document.

I certify under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2014.



Donald R. Horsley  
President & CEO, Southern Communications Services, Inc.  
d/b/a SouthernLINC Wireless

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 20 day of June, 2014.



NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_ My Commission Expires 4/26/16

**Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
229006ga610**

## **July 1, 2014 § 54.313 Progress Report**

Southern Communications Services, Inc., d/b/a SouthernLINC Wireless

(“SouthernLINC,” “Company”) operates a wireless communications network in the States of Alabama and Georgia, in the southeast portion of Mississippi and in the panhandle of Florida. SouthernLINC provides dispatch radio, cellular, text and data services to commercial customers and to the electric utility subsidiaries of its parent, The Southern Company (“Southern,” “Parent”). The Company’s commercial customers include first and second responder public safety entities.

SouthernLINC’s service territory experiences severe weather including, hurricanes, ice storms, severe thunderstorms and tornados. To ensure that its network performs during such events, its **REDACTED** cell sites are connected to a ring protected terrestrial backhaul system. Of the **REDACTED** cell sites in service at December 31, 2013, all were equipped with on-site battery back-up power facilities capable of maintaining cell site operations should commercial power be lost. Back-up power generators and batteries are both available at **REDACTED** of the cell sites. SouthernLINC also has **REDACTED** cell sites on wheels (“COWS”), **REDACTED** cell augmentation trailers (“CATS”), **REDACTED** generators on a trailer (“GOATS”) and **REDACTED** emergency microwave units (“EMU”) that can be deployed to restore service in impacted areas.

SouthernLINC has an incident response team (“IRT”) comprised of subject matter experts from all departments of the Company which convenes as severe weather approaches. The Company has written processes that are followed before and during severe weather incidents and these written processes are reviewed and adjusted as appropriate subsequent to a storm or

**Southern Communications Services, Inc.,  
d/b/a SouthernLINC Wireless  
229006ga610**

**July 1, 2014 § 54.313 Progress Report**

other emergency incident. The IRT and written processes are also useful in addressing unexpected incidents.

The following is an excerpt from the written processes that would be used approximately two days before a hurricane is predicted to make landfall. In this excerpt, “operating companies” refers to the electric utility subsidiaries of SouthernLINC’s Parent and “SCS” refers to a services company subsidiary of the Parent.

**REDACTED**

The Company’s full written processes similarly details steps to be taken beginning five days in advance of a hurricane’s predicted landfall. Additionally, since SouthernLINC is the primary wireless communications service provider to the electric utility operating companies of Southern, it coordinates its storm preparedness and recovery activities with those companies.

SouthernLINC Wireless believes that its network design, extensive on-site back-up power facilities and emergency preparedness activities demonstrates it is capable of remaining functional in an emergency consistent with 47 C.F.R. § 54.202(a)(2).

(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control N  
July 2013

<010>	Study Area Code	229006
<015>	Study Area Name	SOUTHERN COMMUNICATIONS SERVICES, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jim Ucci
<035>	Contact Telephone Number - Number of person identified in data line <030>	6784431562 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jfucci@southernco.com

1/1/2014	
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<701> Residential Local Service Charge Effective Date

<703>

[illegible]



